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Office of Public Instruction
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Date: September 2010

To: School Food Authority Administrators

From: Christine Emerson, Director
School Nutrition Programs

Re: **Instructions for Verification:** LEAs with **less than 80%** household response rate in the previous school year

Verification is the process by which Local Educational Agencies (LEAs) confirm the eligibility of a sample of approved applications for free and reduced-price school meals.

The verification process must be completed by **November 15**. You must submit the Summary of Verification form to this office by December 15. It is highly recommended that you separate applications based on the categories listed on the Summary of Verification form (1a through 2). Separating the applications as they come in will make the verification procedure easier.

The following prototype letters are available at <http://www.opi.mt.gov/schoolfood/index.html> and are required to successfully complete the verification process. Contact our office at (406) 444-2501 if you have questions.

- Notification of Selection for Verification (*We Must Check Your Application*)
- Notification of Verification Results (*We Have Checked Your Application*)

Verification does **not** apply to:

- Residential Child Care Institutions, except for those with applications for attending day students;
- Schools in non-base years using Special Provisions 2;
- Households whose determinations are directly certified as eligible for free meals using Department of Public Health and Human Services letters and SNAP (food stamp) reports;
- Homeless, migrant and/or runaway students identified by the LEAs homeless liaison; and
- Non-applicants approved by local officials (administrative applications).

See the following instructions for verification activities. For more information, use the *Eligibility Guidance for School Meals Manual*: <http://www.fns.usda.gov/cnd/Governance/notices/iegs/EligibilityManual.pdf> (starting on page 62) or call School Nutrition Programs at (406) 444-2501.

Instructions for Verification Activities (Error Prone Method)

Beginning of School Year to October 1

Collect and approve applications for free and reduced-price meals.

October 1 to November 15

Count the number of **applications** approved for free and reduced-price meals and the number of **students** approved on the applications as of **October 1**. *Directly certified, homeless and administrative students are not eligible for verification, but the number of students must be included on the Summary of Verification.*

1. *Calculate* the sample size of 3 percent using **all** approved **applications** on file as of October 1 (1b through 2 – all applications except directly certified, homeless or administrative). Round all decimals up to whole numbers. For example: 2.25 would need to be rounded up to 3.
2. *Draw* the required number of **applications** from **only** the error prone applications (see attached definition). Do **not** verify any less than or any more than 3% of applications for the formal verification process.
 - If there are more error-prone applications than needed for the minimum sample size, select a random sample from those applications.
 - If there are not enough error-prone applications to meet the minimum sample size, draw the remainder needed from among the other applications.
 - At least one income application must be verified, choosing error-prone applications first.
3. Once the applications have been drawn for verification, a “preliminary review” must be conducted. A person other than the determining official must check the applications pulled for verification to ensure that they were determined correctly before the verification process can proceed.
4. Send the prototype Notification of Selection for Verification letters to the selected households. This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>.
 - The household should have ten working days to submit income documentation.
 - The household may provide proof that the child is a member of a household receiving assistance under the SNAP (Food Stamp Program), TANF or FDPIR instead of providing income information and social security numbers of adult household members.
 - The household must be provided with a name of the person at the district who can answer questions and provide assistance and a no-cost telephone number.
 - If a household does not respond, you must follow-up with that household at least once before that household is deemed non-responsive and meal benefits are ceased.
 - If a household selected for verification transfers out of the district before the information can be verified, a new application must be selected for verification.
5. Once responses have been received, re-determine the household’s benefits and send the prototype Notification of Verification Results letter to the households. This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>.

All verification activity must be completed by **November 15** (steps 1 through 5 above).

November 15 to December 15

Complete the Summary of Verification form and send to School Nutrition Programs by **December 15** (keep copies of original applications, letters to households, and Summary of Verification form on file at the district).

Definitions

Did Not Respond

Non-response rate is defined as the percentage of approved household applications selected for verification for which verification information was not obtained by the LEA. This definition is used to determine if a follow-up contact is required and to report the non-response rate on the Summary of Verification Report.

The following are considered non-responses:

- ✓ The household does not contact the LEA when the initial request for verification is sent or when the LEA attempts follow-up;
- ✓ The household responds to the initial request but provides incomplete information and the LEA is unable to determine if the eligibility determination was correct; or
- ✓ The household responds to the initial request but fails to provide the LEA with documents or is otherwise unable to provide appropriate documentation.

Any of these outcomes must be reported as “Did Not Respond” in line 8 on the Summary of Verification Report.

Directly Certified

Students determined as eligible for free school meals using data from Department of Public Health and Human Services letters and SNAP (food stamp) reports.

Error-Prone Applications

Application income reported within \$100 per month or \$1,200 per year of the Income Eligibility Guidelines.

Verification for Cause

The LEA has an obligation to verify all questionable applications (for cause). However, verification that is done “for cause” is **in addition to** and **should not be included** in the sample required for the formal verification process.

It is important to note the fine distinction between *calculating* the sample size and *drawing* the sample applications. *Calculate* the number of applications to be reviewed (the sample size) from **all** the applications except directly certified students. *Draw* the required number of applications from **only** the error-prone applications.